

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:23CR163
)	
Plaintiff,)	JUDGE BRIDGET M. BRENNAN
)	
v.)	
)	
MLADEN THOMAS STRBAC,)	<u>GOVERNMENT'S RESPONSE IN</u>
)	<u>OPPOSITION TO DEFENDANT'S</u>
Defendant.)	<u>MOTION TO TRAVEL</u>

Now comes the United States of America, by and through its attorneys, Michelle M. Baeppler, First Assistant United States Attorney, and Kelly L. Galvin, Assistant United States Attorney, and hereby responds in opposition to Defendant's Motion to Travel.

On March 23, 2023, Strbac was indicted for one count of being a felon in possession of ammunition. (ECF #1). After investigation by the ATF, ammunition was found in his machine shop pursuant to a federal search warrant. Strbac is prohibited from possessing firearms by his prior convictions for possessing a silencer and passport fraud. During the instant investigation, ATF determined Strbac had been manufacturing other devices that qualified as machineguns.

During Strbac's initial appearance, the government agreed that pretrial release was appropriate but specifically stated on the record that given the nature of the charges and his prior record, and the instant offense conduct originated from his manufacturing of firearms-related devices, that after indictment he could not be involved with anything related to firearms. As part of the conditions of release Strbac was ordered not to "possess a firearm, destructive device, or other weapons." (ECF #8).

Strbac's motion to travel contains little information regarding the purpose of travel other than to attend "training" with MDN Unlimited, LLC in Sapulpa, Oklahoma. Upon review of

web-based searches, the website ‘mdnunlimitedusa.com’ listed on the Facebook page is not active.¹ However the Facebook page lists the company as a ‘tactical development company.’ Many of the photographs are of firearms and/or persons with or using firearms. [\(2\) MDN Unlimited | Facebook.](#)



Further, it appears that MDN Unlimited LLC is affiliated with a federal firearms licensee, in Mannford, Oklahoma, [FFL API for Developers and FireArm Dealers Directory in USA - FFL API](#) and boasts it is the only centralized solution for federal firearms license, developers, and gun dealers. In short, it appears Strbac is going to attend a training to violate the terms of his

¹ [MDN UNLIMITED LLC in Sapulpa, OK | Company Info & Reviews \(bizapedia.com\)](#)

pretrial release, or at the very least to walk an extremely fine line. The government now has serious concerns that Strbac is currently in violation of the release conditions given the motion for travel. Should Strbac still be involved in the manufacture of firearms-related part, accessories, or other devices he risks further charges on the instant indictment and detention. While the government understands that it cannot dictate his method of employment or business development his persistent involvement in the manufacture of firearm-related devices sends a message that he will continue to remain involved in the firearms industry. See also Rare Breed Triggers, LLC et al v. Strbac, 1:22-cv-00280.

For all the foregoing reasons the government is opposed to the motion to travel.

Respectfully submitted,

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